

REQUIRED STATEMENT TO ACCOMPANY
ALL MOTIONS TO MODIFY STAY

All Cases: Debtor(s) Asia Ibrahim

Case No. 18-28393

Chapter 13

All Cases: Moving Creditor Wells Fargo Bank, N.A.

Date Case Filed October 9, 2018

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☒ Other (describe) Dismissal

Chapter 13: Date of Confirmation Hearing _____ or Date Plan Confirmed February 14, 2019

1. Collateral
 - a. Home 9521 Lawler Avenue, Skokie, IL 60077
 - b. Car Year, Make and Model _____
 - c. Other (describe) _____
2. Balance owed as of September 11, 2019 is \$ 266,894.93
Total of all other liens including collateral \$ 0.00
3. In chapter 13 cases, attach a payment history listing the amount and dates of all payments received from the debtor(s) post-petition:
4. Estimated Value of Collateral (must be supplied in **all** cases) \$ 277,500.00
5. Default
 - a. Pre-Petition Default
Number of months 48 Amount \$ 92,009.65
 - b. Post-Petition Default
 - i. On direct payments to the moving creditor
Number of months 4 Amount \$ 7,535.83
 - ii. On payments to the Standing Chapter 13 Trustee
Number of months N/A Amount \$ N/A
6. Other Allegations
 - a. Lack of Adequate Protection § 362 (d) (1)
 - i. No Insurance _____
 - ii. Taxes Unpaid _____ Amount \$ _____
 - iii. Rapidly depreciating asset _____
 - iv. Other (describe) _____
 - b. No Equity and not Necessary for an Effective Reorganization § 362 (d) (2) _____
 - c. Other "Cause" § 362 (d) (1) _____
 - i. Bad Faith (describe) _____
 - ii. Multiple filings _____
 - iii. Other (describe) _____
 - d. Debtor's Statement of Intention regarding the collateral
 - i. ☐ Reaffirm
 - ii. ☐ Redeem
 - iii. ☐ Surrender
 - iv. ☒ No Statement of Intention Filed

Date: September 16, 2019

/s/ Michael J. Kalkowski
Counsel for Movant